

1 David R. Ongaro (State Bar No. 154698)  
dongaro@ongaropc.com  
2 Glen Turner (State Bar No. 212417)  
gturner@ongaropc.com  
3 ONGARO PC  
50 California Street, Suite 3325  
4 San Francisco, CA 94111  
Telephone: (415) 433-3900  
5 Facsimile: (415) 433-3950

6 Attorneys for Plaintiff  
7 WAYNE RUDEN

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF ARIZONA**

11  
12 **IN RE: BARD IVC FILTERS**  
**PRODUCT LIABILITY LITIGATION,**

13  
14 **THIS DOCUMENT RELATES TO:**

MDL Docket No. 15-02641

15 **WAYNE RUDEN,**  
16 **C. A. No.: CV-16-00344-PHX-DGC**

17 **WAYNE RUDEN,**  
18 **Plaintiff,**  
19 **vs.**  
20 **C.R. BARD, INC., et al.,**  
21 **Defendants.**

**DECLARATION OF GLEN TURNER**  
**IN SUPPORT OF PLAINTIFF WAYNE**  
**RUDEN'S MOTION FOR REMAND**

Complaint Filed: October 7, 2015

**\*ORAL ARGUMENT REQUESTED\***

1 I, Glen Turner, declare as follows:

2 1. I am an attorney licensed to practice law in California. I am an attorney  
3 with the law firm of Ongaro PC, attorneys of record for plaintiff Wayne Ruden in the  
4 above captioned matter. I am one of the attorneys prosecuting this matter for Mr. Ruden.  
5 The facts set forth herein are of my own personal knowledge and if called upon to testify,  
6 I could and would do so competently. I submit this declaration in support Mr. Ruden's  
7 reply memorandum on his Motion for Remand.

8 2. Attached as **Exhibit 1** is a true and correct copy of Mr. Ruden's First  
9 Amended Complaint.

10 3. Attached as **Exhibit 2** is a true and correct copy of Mr. Ruden's original  
11 Complaint.

12 I declare under the penalty of perjury under the laws of the State of California that  
13 the foregoing is true and correct, and that this declaration was executed on March 3,  
14 2016, in San Francisco, California.

15 

16  
17 \_\_\_\_\_  
18 Glen Turner  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of March, 2016, a copy of the foregoing was served electronically and notice of the service of this document will be sent to all parties by operation of the Court's electronic filing system to CM/ECF participants registered to receive service in this matter. Parties may access this filing through the Court's system.

/s/Glen Turner  
Glen Turner